Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Administration of the	)	CC Docket No. 92-237
North American Numbering Plan	)	Phase 1

GTE REPLY COMMENTS

GTE Service Corporation, on behalf of its GTE Telephone Operating Companies ("GTOCs") and GTE Mobile Communications (collectively, "GTE"), hereby submits its Reply Comments on the Phase 1 issues identified in Commission's Notice of Inquiry ("NOI"), FCC 92-470, released October 29, 1992, in the above-referenced docket.[1]

INTRODUCTION

The number of parties[2] commenting in this proceeding signifies the importance of numbering resources and their administration to the telecommunications industry not only in the United States, but in World Zone 1.

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1 By an Order released January 8, 1993, the Deputy Chief of the Common Carrier Bureau extended the due date for Reply Comments on Phase 1 of the proceeding until February 24, 1993. GTE is limiting these Reply Comments to the issues that the FCC included in the NOI since these are the only issues for which Comments were sought. Some parties have tried to expand the scope of this proceeding beyond the NOI. Should the FCC desire Comments on additional numbering issues, GTE assumes an appropriate Notice will be issued.

2 Attachment A is a list of the parties and the abbreviations used herein to reference their Comments.

GTE wants to emphasize that any decisions that result from the outcome of this or future proceedings must not revolve around only the United States, but all of World Zone 1 as it is imperative to maintain the standard of excellence that has been established for telecommunications in this arena. Another objective that GTE believes is vitally important in this proceeding is that numbers, as part of the public domain, should be used in the most efficient manner possible to benefit the public interest.[3]

DISCUSSION

OVERALL ADMINISTRATION OF THE NORTH AMERICAN NUMBERING PLAN

Common themes for the administrator of the North American Numbering Plan ("NANP") were found throughout the comments: a competent entity with related expertise; impartial; operates under clearly defined guidelines and well-documented procedures; a clear definition of roles and responsibilities; timely resolution of numbering issues; and includes industry participants in decision-making. GTE agrees with all of these requirements. GTE has stated in the past

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3 See GTE's Comments, CC Docket No. 92-105, The Use of N11 Codes and Other Abbreviated Dialing Arrangements (June 5, 1992) at 1-2: "Service codes are a scarce public resource that should be used in the most effective and efficient manner possible, one that benefits the public at large." Many parties commenting in this N11 proceeding expressed a desire to have N11 codes assigned for Telecommunications Relay Services ("TRS") which provide a public interest benefit and expand universal service; e.g., National Center for Law and Deafness; United Cerebral Palsy Associations; Telecommunications Relay Services Advisory Board of DC; Hearing Society; Pittsburgh Hearing, Speech and Deafness Services, Inc.; and the Berks County Association for the Hearing Impaired, Inc. GTE supports the use of N11 codes for services that promote the public benefit such as 9-1-1 for emergency services and would support the use of N11 code(s) for TRS if it is determined that this use would be in the public interest.

and continues to maintain that a well-documented and equitable process for making numbering resources available is more critical than who administers the actual assignment. (See GTE Comments at 5)

The majority of parties, with the exception of the local exchange carriers ("LECs"), have expressed concern with Bellcore remaining as the North American Numbering Plan administrator("NANPA"). But all industry segments agree that any change not be disruptive to the activities in progress and that Bellcore's technical expertise should not be lost in a transition. GTE believes that these are important aspects to be considered in whatever decision results from this or any future proceedings.

A consensus among the parties appears to favor the establishment of an industry advisory forum to resolve World Zone 1 numbering policy issues.[4] Although GTE believes that existing industry fora are adequately performing their responsibilities, the establishment of a single entity to address policy issues could improve industry resolution of these issues and could mitigate the concerns expressed in the comments. Such a policy forum would necessarily work within the boundaries set by the regulatory authorities of the countries comprising World Zone 1. GTE is indifferent as to whether a new entity is established or whether an existing industry forum expands its charter to include NANP policy issues. However, it is critical that any entity established or designated to perform this function develop a clearly defined mission and scope to deal with all numbering issues and operate under a framework of due process to govern its work.

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4 Pacific at 4; Bell Atlantic at 12; SBC at 5; SNET at 3; Bell Canada at 4; North Pittsburgh at 2; CenTel at 3; NYDPS at 2; MCI at 1; AT&T at 5; Sprint at 7; UniTel at 2.; McCaw at 4; CTIA at 3; Telocator at 2; PageNet at 1; MFS at 4; TCG at 6; NCTA at 3; Cox at 9.

Given that an entity is designated to establish numbering policies, procedures, and guidelines, GTE believes that Bellcore should continue in its role as the NANP administrator with oversight from this entity. However, the administrative function involves planning in addition to administration. It is not simply a "clerical" function. While the advisory entity may set policy, the industry must continue to plan for the future. This planning role is best left with the administrator who has a "hands on" knowledge of what is happening and what actions need to be taken to ensure that numbering resources do not reach the state of exhaustion before plans are in place for relief. Any plans of action would be submitted to the advisory entity for review.

The majority of parties commenting expressed the same opinion in two areas: (i) the Commission should remain as the only regulatory oversight body in the United States; and (ii) it is time for the industry as a whole to share in the funding of the NANPA. GTE stated in its Comments (at 11) that funding is a difficult issue to resolve and must be accomplished in a non-discriminatory manner and shared by all industry participants. Many alternatives were proposed by various parties including: funding allocations based on customer count or numbering resources used; application fees; a monthly charge to users; and funding based on demands on the administrator. GTE maintains that any methodology selected should: (i) be an equitable sharing by all industry segments; (ii) remove any perception of influence by any industry segment; (iii) recognize that everyone in World Zone 1 benefits from the administration of the NANP; (iv) recognize that numbers are a finite resource requiring efficient use and should not be supplied based on a "who can pay" mentality; and (v) indicate that assignment of a number does not imply "ownership." In addition, assignment must be based on expected usage within a reasonable time frame and provide for the return of unused assignments.

PERSONAL COMMUNICATIONS SERVICES

GTE supports the use of both geographic and non-geographic NANP numbering resources for the provision of Personal Communications Services ("PCS"). These applications correspond to International Telephone and Telegraph Consultative Committee ("CCITT") Recommendation E.168 scenarios labeled the home- and country-based schemes. In both applications, GTE supports the requirement that dialing parity must be maintained within a scheme so that all providers are equally advantaged. Therefore, GTE does not support the use of a carrier prefix or a new unique numbering scheme for PCS. As GTE stated in its Comments (at 13), the use of a prefix will cause customer confusion and significant network costs to support the recognition and routing of these types of calls.[5]

GTE is committed to the efficient usage and assignment of NANP numbering resources. This is one of the main reasons GTE supports the eventual portability of PCS numbers through a shared data base under the N00 code assigned by the NANPA. The eventual migration towards a portable environment will enable maximum use of the approximately 8 million numbers under the PCS N00 code. In this environment each number can be assigned to any service provider thus eliminating the need to reserve blocks of unused numbers for different service providers. This would be similar to 800 Service number portability which the FCC has determined is in the public interest.

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5 See Attachment B for GTE's concerns about the use of a prefix dialing plan.

With respect to PCS number portability, GTE is very encouraged by the industry support reflected in the comments for a shared database.[6] GTE urges the Commission to require a shared database for PCS number portability that is similar in concept to that used for 800 number portability. Number portability for PCS is required for efficient operation as well as to provide the maximum possible numbering resources. The public will benefit by not being required to change PCS numbers when changing service providers.

LOCAL NUMBER PORTABILITY

GTE agrees with US West that "'local number portability,' is a generic term that is used to refer to different capabilities."[7] As can be seen from the comments, many parties provided a definition of local number portability or made assumptions regarding its definition before discussing it.[8] Attempting to implement something that has yet to be defined is impossible. Some parties suggest that local number portability will require Advanced Intelligent Network ("AIN") and Signaling System 7 ("SS7") capabilities.[9] If so, the network is not ready to support local number portability. SS7 is being deployed in many areas, but AIN is not available for widespread deployment nor will it be in the immediate future. In addition, the impacts of local number portability on SS7 and other services that rely on SS7 need further study. As for the costs to implement local

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6 Bell Atlantic at 4, Pacific at 11-12, CenTel at 2, ICC at 6, Sprint at 10, NCTA at 5, Cox at 13.

7 US West at p.1.

8 MFS at 8; McCaw at 19; MCI at 28; SBC at 13, n.17; Pacific at 13; Telocator at 11, n.11; Bell Canada at 6; TCG at 6.

9 USTA at 14; SNET at 9; TCG at 8.

number portability, it is just as impossible to determine the costs, as it is the technical feasibility, until the service is defined. Local number portability has not been addressed in enough detail to make a firm commitment for its implementation. The industry needs to study the technical requirements and the feasibility of this service and weigh the benefits and the costs before any decisions regarding implementation are made.[10]

As with costs associated with Interchangeable Numbering Plan Areas ("INPAs") and Carrier Identification Codes ("CICs"), costs associated with the implementation of local number portability should be determined by the Commission as exogenous for price cap companies. The costs for INPA and CICs are being incurred to expand exhausting resources, and CIC expansion and local number portability will foster competition in the interexchange and access markets. These results are because of the FCC's pro-competitive policies and, thus, are truly costs "triggered by administrative, legislation or judicial action beyond the control of the carriers."[11]

CONCLUSION

Numbering resources are an important part of this nation's telecommunications infrastructure. There are many emerging policy issues that will need to be resolved concerning this resource. There appears to be consensus on many issues raised in the NOI, including many of the attributes of

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10 BellSouth at 16; North Pittsburgh at 3; ICC at 7; MCI at 28; Sprint at 11; Telocator at 11, n.11; PageNet at 9.

11 Second Report and Order, CC Docket No. 87-313, In the Matter of Policy and Rules Concerning Rates for Dominant Carriers (Sept. 19,1991), at para. 266.

an impartial administrator for the NANP. The record supports the establishment of a single entity to address policy issues related to numbering as well as establishing the procedures and guidelines to implement the policy. With regard to the day-to-day administration of numbering resources and planning for exhaustion and expansion of these resources, GTE believes Bellcore should continue in this role of NANPA, with oversight from the policy forum and the Commission. This is more than a mere clerical function. Proposed plans would be submitted to the policy forum for review and the transition to the new structure must be done in a way that minimizes disruption to work that is already in progress, GTE is indifferent as to whether this policy forum is a new entity or an existing industry forum with an expanded charter. The numbering forum, however, must operate under a framework of due process to govern its work.

There also appears to be consensus that all industry segments that use and benefit from numbering resources need to contribute to numbering administration. Many methods have been proposed for FCC consideration. With regard to PCS, GTE supports the use of both geographic and non-geographic NANP resources and the requirement that dialing parity be maintained. GTE also believes PCS number portability is in the public interest.

Local number portability is less well defined and, thus, needs to be studied further. Industry needs to define and study the technical requirements and the feasibility of this service and weigh the costs and benefits before any decision to implement can be made. Recovery of costs also needs to be

addressed and GTE believes these costs should be viewed as exogenous for price cap companies.

Respectfully submitted,

GTE Service Corporation,
on behalf of the GTE Telephone
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February 24, 1993

ATTACHMENT A

In addition to GTE, the following parties filed Comments:

Ad Hoc Telecommunications Users Committee ("Ad Hoc")
Aeronautical Radio, Inc. ("ARINC")
Air Transport Association of America ("ATA")
Allnet Communications Services, Inc. ("Allnet")
AMSC Subsidiary Corporation ("AMSC")
American Personal Communications ("APC")
American Public Communications Council ("APCC")
American Telephone and Telegraph Company ("AT&T")
Ameritech Operating Companies ("Ameritech")
Association for Local Telecommunications Services ("ALTS")
Bell Atlantic ("Bell Atlantic")
Bell Canada ("Bell Canada")
Bell Communications Research, Inc. ("BellCore")
BellSouth Corporation ("BellSouth")
Canadian Steering Committee on Numbering ("CSCN")
Cellular Telecommunications Industry Association ("CTIA")
Centel Corporation ("CenTel")
Competitive Telecommunications Association ("CompTel")
Cox Enterprises, Inc. ("Cox")
Illinois Commerce Commission ("ICC")
Information Industry Association ("IIA")
Intellicall, Inc. ("Intellicall")
Local Area Telecommunications, Inc. ("LOCATE")
McCaw Cellular Communications, Inc. ("McCaw")
MCI Telecommunications ("MCI")
Metrocall of Delaware, Inc. ("Metrocall")
MFS Communications Co., Inc. ("MFS")
National Association of Regulatory Utility Commissioners ("NARUC")
National Cable Television Association ("NCTA")
National Telephone Cooperative Association ("NTCA")
New England Telephone and Telegraph Company and New York Telephone Company ("NYNEX")
New York Department of Pubic Service ("NYDPS")
North American Telecommunications Association ("NATA")
North Pittsburgh Telephone Company ("North Pittsburgh")
Pacific Telesis ("Pacific")
Paging Network, Inc. ("PageNet")
Public Service Commission of the District of Columbia ("D.C. PSC")
Rochester Telephone Corporation ("Rochester")
Rogers Cantel ("Cantel")
Southwestern Bell Corporation ("SBC")

Southern New England Telecommunications Corporation ("SNET")
Spectrum Measurement Corporation
Sprint Corporation ("Sprint")
State of Florida Public Service Commission ("FLPUC")
State of New York Department of Public Service ("NYDPS")
Telco Planning, Inc. ("TPI")
Telcom Canada
Teleport Communications Group ("TCG")
Telocator ("Telocator")
United States Telephone Association ("USTA")
United Telecommunications, Inc. ("UTI")
UniTel Communications, Inc. ("UniTel")
US WEST Communications ("US West")
Vanguard Cellular Systems, Inc. ("Vanguard")
Whidbey Telephone Company ("Whidbey")
WilTel, Inc. ("WilTel")

T1P1.3/92-061

CONTRIBUTION TO T1 STANDARDS COMMITTEE

TITLE: OUTSTANDING QUESTIONS ON THE UPT PREFIX IDENTIFIER

SOURCE: GTE TELEPHONE OPERATIONS

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ABSTRACT: This contribution supports the requirement to generate a US UPT numbering standard. Towards this objective the UPT prefix identifier requires clarification in a number of areas. This contribution poses ten questions whose response will provide this needed clarification.

DATE: APRIL 20, 1992

DISTRIBUTION: T1P1.3

Introduction

Over the past year, the telecommunications industry (both in the US and worldwide) has been evaluating and formulating the appropriate numbering plan for UPT applications. As a consequence of these deliberations, a draft CCITT Recommendation E.168 ("Application of E.164 Numbering Plan for UPT") has been generated and it is now scheduled for accelerated approval in June, 1992 within CCITT SGII. The E.168 draft recommendation includes three independent scenario schemes (Home-related, Country-based, and Global). These scenarios may co-exist in the international network. In addition, a prefix dialing plan has been identified as a method of recognizing that the following digits represent a UPT number.

From a US perspective, a particular scenario or dialing plan has not been selected as standard methodology for accessing UPT within the US.

GTE Telephone Operations maintains that T1P1 should produce a US "UPT Numbering Plan" standard (as elaborated in a companion contribution T1P1/92-060). To achieve this goal, it is essential that a clear and unambiguous explanation of all recommended UPT numbering and dialing alternatives are generated.

This contribution contains a list of questions concerning the proposal for a UPT prefix dialing plan.

Essential Issues on Prefix Dialing

In support of the 12 technical numbering and addressing issues for UPT that the ad hoc numbering group has agreed to address, and objectives 1, 3, and 5 listed in Section IV (Future Work Plan) in the Report of the Ad Hoc Group on Numbering and Addressing - T1P1 3/92-036; the following questions on the UPT prefix dialing plans are presented. The following questions are based on discussions over the last year in various standards fora (e.g., US State Department-SG"A," CCITT SGII, and T1P1.3).

This list of questions requires clear definitive answers so that there is a technical understanding of what and why the prefix dialing plan is being considered.

1. What are the technical benefits of a prefix dialing plan if the number following the prefix already identifies the number as a UPT number?

2. What are the technical, operational, equipment, and system requirements of supporting a UPT prefix dialing plan?

3. What is the exact format of the number following the UPT prefix? E.164? Is it the same in all implementations?

4. What are the technical advantages of dialing additional digits (i.e., the UPT prefix and a UPT number) to place a UPT call?

5. Can a UPT member be portable if it contains UPT service provider identification following the UPT prefix identifier?

6. What are the technical network architectural advantages of adopting a UPT prefix identifier?

7. Are the number of area codes being set aside for non-geographic applications after 1995 sufficient? What quantity of numbers would be sufficient to accommodate the three UPT numbering scenarios in E.168?

8. What are the technical advantages of having subscribers dial UPT calls in a different fashion than regular POTS/ISDN calls?

9. Is the UPT prefix approach solely contingent on the availability of an international prefix available worldwide?

10. Can the prefix plan be implemented before 1997 when 15 digit is permissible?

This is not intended as an all-inclusive list of issues surrounding the UPT prefix identifier. GTE Telephone Operations recommends that the industry participants who support the use of a UPT prefix identifier provide clear definitive responses to the above issues; so that due consideration be given to this UPT implementation concept.

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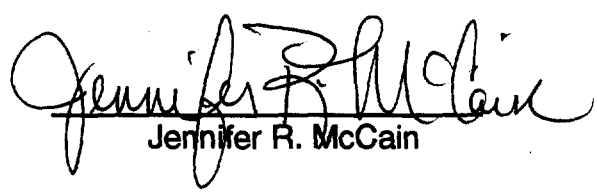
Certificate of Service

I, Jennifer R. McCain, hereby certify that copies of the foregoing "GTE's Reply Comments" have been mailed by first class United States mail, postage prepaid, on the 24th day of February, 1993 to all parties of record.



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